

**BATHAE DUNNE LLP**

Yavar Bathae (CA 282388)  
yavar@bathaeedunne.com  
Edward M. Grauman (*p.h.v. forthcoming*)  
egrauman@bathaeedunne.com  
Andrew C. Wolinsky (*p.h.v. forthcoming*)  
awolinsky@bathaeedunne.com  
445 Park Avenue, 9th Floor  
New York, NY 10022  
Tel.: (332) 322-8835

Brian J. Dunne (CA 275689)  
bdunne@bathaeedunne.com  
633 West Fifth Street, 26th Floor  
Los Angeles, CA 90071  
Tel.: (213) 462-2772

*Interim Co-Lead Counsel for the  
Advertiser Class*

**SCOTT+SCOTT ATTORNEYS AT LAW LLP**

Kristen M. Anderson (CA 246108)  
kanderson@scott-scott.com  
230 Park Avenue, 17th Floor  
New York, NY 10169  
Tel.: (212) 223-6444

Christopher M. Burke (CA 214799)  
cburke@scott-scott.com  
David H. Goldberger (CA 225869)  
dgoldberger@scott-scott.com  
Kate Lv (CA 302704)  
klv@scott-scott.com  
600 W. Broadway, Suite 3300  
San Diego, CA 92101  
Tel.: (619) 233-4565

Patrick J. McGahan (*pro hac vice*)  
pmcgahan@scott-scott.com  
Michael P. Srodoski (*pro hac vice*)  
msrodoski@scott-scott.com  
156 South Main Street, P.O. Box 192  
Colchester, CT 06415  
Tel.: (860) 537-5537

(Additional counsel on signature page)

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE DIVISION

MAXIMILIAN KLEIN, et al., on behalf of  
themselves and all others similarly situated,

Plaintiffs,

v.

FACEBOOK, INC.,

Defendant.

Case No. 20-CV-08570-LHK

The Hon. Lucy H. Koh

**CLASS ACTION**

**[PROPOSED] ORDER GRANTING  
ADMINISTRATIVE MOTION TO SEAL  
TEXT FROM JOINT DISCOVERY  
LETTER BRIEF RE: PRIVILEGE  
DISPUTE**

1 Advertiser Plaintiffs moved the Court to issue an administrative order (“Motion to Seal”)  
2 authorizing filing under seal portions of text from Advertiser and Consumer Classes and Defendant  
3 Facebook, Inc.’s (the “Designating Party”) Joint Discovery Letter Brief re: Privilege Dispute (“Letter  
4 Brief”), stating that the following portions of the Letter Brief reflect contents of documents produced  
5 and designated “CONFIDENTIAL” by Designating Party under the Stipulated Protective Order  
6 entered by the Court on June 21, 2021 (ECF No. 111):

- 7 • Two block-quoted paragraphs on page 2, which are quoted from a document produced by  
8 Designating Party with bates number PALM-002033234.
- 9 • Several words on page 3, which are quoted from documents produced by the Designating  
10 Party with bates numbers PALM-002033147–48, PALM-002033151, and PALM-  
11 002033558.

12 Consumer Plaintiffs and Defendant Facebook, Inc. do not oppose the Motion to Seal.  
13

14 Having considered Advertiser Plaintiffs’ Motion to Seal and supporting declaration, IT IS  
15 HEREBY ORDERED THAT: Advertiser Plaintiffs’ Motion to Seal is GRANTED and the  
16 information listed above be sealed. The unredacted version of the Letter Brief shall remain under  
17 seal.  
18

19 Dated: \_\_\_\_\_

\_\_\_\_\_  
HON. VIRGINIA K. DEMARCHI  
United States Magistrate Judge